

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION**

In re:

Erin Energy Corporation, *et al.*,<sup>1</sup>

Debtors.

Case No. 18-32106

(Chapter 7)

(Jointly Administered)

**NIGERIAN AGIP EXPLORATION LIMITED’S  
RESERVATION OF RIGHTS REGARDING INTERIM FEE APPLICATIONS**

(Related to Docket Nos. 497, 498, 499 and 501)

TO THE HONORABLE MARVIN ISGUR, U.S. BANKRUPTCY JUDGE:

Nigerian Agip Exploration Limited (“**NAE**”), through its undersigned counsel, hereby files this Reservation of Rights (the “**Reservation of Rights**”) with regard to each interim fee application filed by Moyes & Co., Stout Risius Ross, Inc., Kasowitz Benson Torres LLP and Diamond McCarthy, LLP [*see* Dkt. Nos. 497, 498, 499 and 501, respectively] (the “**Interim Fee Applications**”). In support of this Reservation of Rights, NAE respectfully states as follows:

1. NAE hereby expressly reserves its rights to object to final approval of the fees and expenses sought in the Interim Fee Applications at a final hearing on any and all grounds including, without limitation, that such fees and expenses are not reasonable.

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<sup>1</sup> The last four digits of Erin Energy Corporation’s federal tax identification number are 9798. The other Debtors in these cases are: Erin Energy Limited; Erin Energy Kenya Limited; and Erin Petroleum Nigeria Limited.

**CONCLUSION**

NAE respectfully requests that, should this Court approve the Interim Fee Applications, such approval should be subject to this Reservation of Rights and any additional objections and reservations of rights that may be raised by NAE at any hearing on the Interim Fee Applications.

Dated: December 5, 2018

Respectfully submitted,

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**COUNSEL FOR NIGERIAN AGIP  
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**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of *Nigerian Agip Exploration Limited's Reservation of Rights Regarding Interim Fee Applications* was served upon all parties listed as receiving electronic notice *via* the courts' ECF noticing system on December 5, 2018.

/s/ Randall A. Rios

Randall A. Rios